

REMARKS

Claims 1-32 are pending in this application. Claims 1, 20 and 32 have been amended. Claims 33-37 are new. No new matter has been added.

35 U.S.C. § 112

Claims 1 and 32 stand rejected under 35 U.S.C. § 112, second paragraph, as being incomplete for omitting essential steps. Further, the claims are rejected under 35 U.S.C. § 112, second paragraph, as being not supported by the limitations in the claims and dependent claims. Applicants respectfully traverse this rejection.

Claims 1 and 32 did not omit an essential step. The office action states that the use for the limitation of “creating a second trace grammar” is not clear. The created second trace grammar is used for tracing as explained in the specification, e.g., at least as disclosed on page 10, lines 3-18. Therefore, no essential step appears to have been omitted. However, to further clarify the scope of the claims without narrowing their scope, claims 1 and 32 have been amended as shown above. Applicants respectfully submit that amended claims 1 and 32 correct the identified section 112 issues to the extent they may exist.

35 U.S.C. § 102

Claims 1-6, 8-15, 18-19, 22, 24-29 and 32 stand rejected under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent 6,708,173 issued to Behr et al. (Behr). Applicants respectfully traverse this rejection.

Claim 1 recites the feature of “creating a second trace grammar wherein the second trace grammar is different than the first trace grammar...” For example, the trace format grammar (TFG) is the set of formatting guidelines that defines the placement of information in its associated trace strings. A set of TFG {TFG1, TFG2,...,TFGn} is defined for the tracing activities in the computing system, where TFG1 refers to a first defined TFG, TFG2 refers to a second defined TFG, and TFGn refers to an nth TFG. Each time a new trace string format needs to be employed, a new TGF is defined that is suitable for the new trace string format. Each TFG in the system should comply with a recognized meta-language grammar. In effect, each TFG uses a unique combination of grammar syntax specified in the meta-language grammar to form

an individual TFG. While all individual TFG includes formatting differences from another individual TFG, all TFGs comply with the guidelines set forth in the meta-language grammar.

In contrast, Behr et al. disclose an application server (the “Cool ICE system”) that interfaces with a specific database management system provided by Unisys. Specifically, Behr et al. disclose standardizing to generically format all trace attributes in a common manner, defining a common trace policy and writing traces to a common file (i.e. see abstract). A common manner means one manner, which corresponds to one grammar. Therefore, Behr discloses one grammar and does not disclose the second trace grammar different than the first as claimed.

Behr et al. column 6, lines 52-58, elaborate upon their tracing process as follows:

The trace formatting provides a standardized facility for generically formatting all trace attributes in a common manner. Generic formatting information consists of such items as PID, Thread ID, and time stamp which are useful to the application developer during debug. This common formatting prepares all attributes for storage and access. (emphasis added)

Therefore, Behr teach a tracing process where trace attributes are formatted in a common manner. Not only is Behr silent with respect to any specific kind of trace grammar or the number of grammar that is involved in the trace formatting of Behr, but Behr in fact teaches away from the idea of allowing multiple trace grammars. The rationale for the Behr approach is to allow multiple trace streams to be unified and standardized into a single common format for trace attributes. As such, Behr would not need to have multiple co-existing trace grammars. In fact, it would frustrate the self-stated purpose of Behr to have multiple trace grammars, since having multiple trace grammars would result in multiple formatting manners for the trace attributes. Therefore, Behr does not disclose a second trace grammar different than a first trace grammar as claimed.

The Office Action has stated that the limitation of “creating a second trace grammar wherein the second trace grammar is different than the first trace grammar in which the second trace grammar also complies with the rules of the meta-language grammar” is disclosed by col. 5, line 4 and col. 6, lines 35-36. Applicants respectfully disagree. Specifically, col. 5, line 4 discloses that data from a legacy system has to be translated in order to be transmitted over the present day Internet. Col. 6, lines 35-36 discloses a tracing facility called “UTrace” that allows

components from one or more applications to write trace information to a common trace file. Translating data and writing to a common file do not anticipate the second trace grammar as claimed, where the second trace grammar complies with the same meta-language grammar as a first trace grammar. That section of Behr is completely silent regarding first and second trace grammars or a meta-language grammar, much less any disclosure regarding the specific claims limitation of “creating a second trace grammar wherein the second trace grammar is different than the first trace grammar...” Therefore, Behr does not disclose all the limitations of the claims.

Furthermore, the Examiner’s response section of the Office Action states that Tex, LaTeX, HTML, XHTML, XML are examples of markup languages. Examples of markup languages do not anticipate a second trace grammar different than the first trace grammar as claimed. Behr does not disclose or suggest that these languages having different formats can be utilized together in a “common manner” for tracing. The Examiner fails to point out where in Behr does it teach or suggest the feature of a second trace grammar different than a first trace grammar. Therefore, Behr does not teach or suggest “creating a second trace grammar wherein the second trace grammar is different than the first trace grammar...”

Furthermore, it is unclear from the office action why being able to work with different mark-up languages implies “creating a second trace grammar wherein the second trace grammar is different than the first trace grammar...” The Office Action does not point out where Behr discloses two TFG that are different from each other. As stated above, Behr merely discloses that trace attributes are formatted in “a common manner.” One common manner does not anticipate “a second trace grammar wherein the second trace grammar is different than the first trace grammar” as claimed.

As noted above, Behr is directed to simplify and harmonize the traces by formatting in a common manner. Behr does not disclose or even hint at using two different grammars as claimed.

For at least the above reasons, Applicants believe that Behr et al. do not anticipate the process of Claim 1. Accordingly, Applicants respectfully request that this rejection be withdrawn.

Claims 2-6, 8-15, and 18-19 depend from Claim 1 and, as such, are patentable over Behr et al. for at least the reasons presented above. In addition, Claims 2-6, 8-15, and 18-19 recite limitations which further distinguish them from Behr et al. Accordingly, Applicants respectfully request that these rejections be withdrawn.

Independent Claim 32 recites limitations substantially similar to those of Claim 1 and, thus, is patentable over Behr et al. for at least the reasons presented above. Applicants therefore respectfully request that these rejections be withdrawn.

Claims 22 and 24-29 depend from Claim 20. Because Claim 20 does not stand rejected under 35 U.S.C. § 102(e), Applicants believe that Claims 22 and 24-29 were improperly rejected under this section. Accordingly, Applicants respectfully request that these rejections be withdrawn.

35 U.S.C. § 103

Claim 7 stands rejected under 35 U.S.C. § 103 as being unpatentable over Behr et al. in view of U.S. Patent 6,754,890 (Berry et al.). According to the Office Action dated January 4, 2007, while Behr et al. do not disclose the limitation “the one or more tables comprises hash tables corresponding to keywords in the one or more traces,” Berry et al. disclose said limitation. Applicants respectfully traverse this rejection.

Claim 7 recites “[t]he process of claim 6 in which one or more tables comprises hash tables corresponding to keywords in the one or more traces.” Claim 7 depends from Claim 6, which in turn depends from Claim 1. Accordingly, Claim 7 includes all the limitations of Claim 1. As discussed above, Behr et al. do not disclose each and every limitation of Claim 1. In particular, Behr et al. fail to disclose at least the limitations of “creating a second trace grammar wherein the second trace grammar is different than the first trace grammar in which the second trace grammar also complies with the rules of the meta-language grammar.” Even if Berry et al. disclose the limitation “the one or more tables comprises hash tables corresponding to keywords in the one or more traces,” as alleged in the Office Action, Barry et al. fail to cure all of the deficiencies of Behr et al. In particular, like Behr et al., Barry et al. fail to disclose the limitations of “creating a second trace grammar wherein the second trace grammar is different

than the first trace grammar in which the second trace grammar also complies with the rules of the meta-language grammar.”

Berry et al. provide a tracing mechanism where the process identifier of a process within a program being monitored is included in the trace file. For example, Berry et al., column 2, line 63, to column 3, line 11, and specifically disclose:

A method of monitoring execution performance of a program is provided. A process identifier associated with a process within a program is determined, and a trace output file is created for the process such that the file name of the trace output file contains the process identifier. Trace records are generated in response to events within the process. The trace records associated with the process are then written to the trace output file associated with the process. Multiple processes may then be associated with unique trace output files simultaneously. Using this methodology, multiple instances of JVMs may be executing simultaneously, and each JVM may be generating trace records through a profiler. However, the origin of the trace records, as identified by the process identifier of the JVM, is used to place the trace information into a file that is identified through the use of the same process identifier. (emphasis added).

Berry et al.’s disclosure of a tracing mechanism that includes a process identifier in each trace file relates to the information content contained in a trace file and, as such, does not teach a process that includes “creating a second trace grammar wherein the second trace grammar is different than the first trace grammar in which the second trace grammar also complies with the rules of the meta-language grammar.” As discussed above in regard to Claim 1, the act of creating a trace grammar allows a user of the claimed process to customize traces to suit his or her particular needs by, for example, creating trace grammars that provide for different trace formats and/or include different trace attributes. The simple inclusion of a process identifier in each trace file, as taught in Barry et al., thus does not allow a user to *create trace grammars*. Consequently, Barry et al. do not make obvious either the claimed act of “creating a second trace grammar wherein the second trace grammar is different than the first trace grammar in which the second trace grammar also complies with the rules of the meta-language grammar.” Barry et al. therefore cannot compensate for the deficiencies of Behr et al.

Applicants also submit that Behr in fact teaches away from the idea of allowing multiple trace grammars. As noted above, the rationale for the Behr approach is to allow multiple trace streams to be unified and standardized into a single common format for trace attributes. As such,

Behr would not need to have multiple co-existing trace grammars. It would completely change the principle of operation espoused by Behr to have multiple trace grammars, since having multiple trace grammars would result in multiple formatting manners for the trace attributes. As such, and pursuant to MPEP 2143.01(VI), there is no motivation to modify Behr in the manner suggested by the Office Action since such a modification would change the principle of operation of Behr.

Because the combination of Behr et al. and Berry et al. fails to teach, disclose or suggest each limitation of Claim 1, Behr et al. and Berry et al. cannot be used to preclude patentability of Claim 7 under 35 U.S.C. § 103. Accordingly, Applicants respectfully request that this rejection be withdrawn.

Claims 16-17, 20, 30, and 31 stand rejected under 35 U.S.C. § 103 as unpatentable over Behr et al. in view of U.S. Patent 6,654,749 (Nashed). According to page 7 of the Office Action dated January 4, 2007, while Behr et al. do not disclose the limitation “performing a search of the semantic network based upon a received query,” Nashed discloses said limitation. Applicants respectfully traverse this rejection.

Claim 16 recites “[t]he process of claim 8 further comprising: performing a search of the semantic network based upon a received query.” Claim 16 depends from Claim 8, which in turn depends from Claim 1. Accordingly, Claim 16 includes all the limitations of Claim 1. As discussed above, Behr et al. do not disclose each and every limitation of Claim 1. In particular, Behr et al. fail to disclose at least the limitations of “creating a second trace grammar wherein the second trace grammar is different than the first trace grammar in which the second trace grammar also complies with the rules of the meta-language grammar.” Even if Nashed discloses the limitation “performing a search of the semantic network based upon a received query,” as alleged in the Office Action, Nashed fails to cure all of the deficiencies of Behr et al. because, like Behr et al., Nashed fails to disclose the limitations of “creating a second trace grammar wherein the second trace grammar is different than the first trace grammar in which the second trace grammar also complies with rules of the meta-language grammar.”

Nashed merely discloses a search engine. For example, Nashed, column 2, lines 40-49, specifically discloses:

In accordance with the present invention, method and system for electronically searching information databases of information sources, which can be accessed for free or on a subscription fee basis, provide for access to information on a topic of interest using a search engine which searches information databases whose data records have been indexed into index fields, such as title, full text content and classification category with a plurality of selections, and where indexing data is stored at an indexed database coupled to the search engine. (emphasis added).

Nashed, column 3, lines 17-21, further teaches:

In one preferred embodiment, the server engine includes a query server containing a search processor which performs searching of the indexed database based on the search query entered and expansion words generated from the search query using semantic network expansion. (emphasis added).

These passages of Nashed detail a search engine that searches indexed database records using semantic network expression. However, Nashed does not teach or suggest anything about a mechanism for tracing, let alone a process for materializing a trace in a markup language syntax that includes the steps of “creating a second trace grammar wherein the second trace grammar is different than the first trace grammar in which the second trace grammar also complies with the rules of the meta-language grammar.” Nashed therefore cannot compensate for the deficiencies of Behr et al.

Because the combination of Behr et al. and Nashed fails to teach, disclose or suggest each limitation of Claim 1, Behr et al. and Nashed cannot be used to preclude patentability of Claim 16 under 35 U.S.C. § 103. Accordingly, Applicants respectfully request that this rejection be withdrawn.

Claim 17 depends from Claim 16 and, as such, is patentable over the combination of Behr et al. and Nashed for at least the reasons presented above. Accordingly, Applicants respectfully request that this rejection be withdrawn.

Claim 20 recites a first mechanism that receives a plurality of trace grammars, wherein the plurality of trace grammars are different than each other, the plurality of trace grammars modifiable within rules of a meta-language grammar. As discussed above in connection with Claim 1, Behr et al. teach a tracing process that involves generically formatting all trace attributes in a common manner. In contrast, the system of Claim 20 allows for the use of plurality of trace grammars, wherein the plurality of trace grammars are different from each

other, and the grammars are *modifiable* within the rules of a meta-language grammar. Because the plurality of trace grammars is modifiable, the claimed system can parse traces that have, for example, different trace formats. Behr et al. teach the advantage of using a single, common trace format, and thus teach away from the use of modifiable trace grammars as recited in Claim 20. Nashed does not disclose anything about the materialization of traces, and therefore does not cure the deficiencies of Behr et al.

Because the combination of Behr et al. and Nashed fails to teach or suggest each and every limitation of Claim 20, Behr et al. and Nashed cannot be used to preclude patentability of Claim 20 under 35 U.S.C. § 103. Accordingly, Applicants respectfully request that this rejection be withdrawn.

Claims 30-31 depend from claim 20 and, as such, are patentable over Behr et al. and Nashed for at least the same reasons presented above. Applicants therefore respectfully request that these rejections be withdrawn.

CONCLUSION


On the basis of the above remarks, reconsideration and allowance of the claims is believed to be warranted and such action is respectfully requested. If the Examiner has any questions or comments, the Examiner is respectfully requested to contact the undersigned at the number listed below.

The Commissioner is authorized to charge any fees due in connection with the filing of this document to Bingham McCutchen's Deposit Account No. **50-2518**, referencing billing number **7017812001**. The Commissioner is authorized to credit any overpayment or to charge any underpayment to Bingham McCutchen's Deposit Account No. **50-2518**, referencing billing number **7017812001**.

Respectfully submitted,
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